

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP, D/B/A VERIZON
WIRELESS and VERIZON CORPORATE SERVICES
GROUP INC.,

Defendants.

Case No. 2:23-CV-00352-JRG-RSP

JURY TRIAL DEMANDED

UNOPPOSED MOTION FOR ENTRY OF SUPPLEMENTAL PROTECTIVE ORDER

Plaintiff Headwater Research LLC (“Headwater”) respectfully moves for the Court to enter the Supplemental Protective Order attached as Exhibit A. Defendants do not oppose.

The Court previously entered a Protective Order to protect party and non-party confidential business information in the above-referenced action on November 1, 2023 (Dkt. No. 45) (“Protective Order”).

Apple Inc. (“Apple”), a non-party to this action, intends to produce confidential source code and other documents in this action that include or incorporate confidential business information (“CBI”) belonging to Apple. The Parties and Apple have agreed to provisions in addition to those contained in the Protective Order to protect such Apple CBI.

Therefore, Headwater respectfully requests that the Court enter the Supplemental Protective Order attached as Exhibit A.

Dated: November 5, 2024

Respectfully submitted,

/s/ Marc Fenster

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**ATTORNEYS FOR PLAINTIFF,
Headwater Research LLC**

CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2024, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via CM/ECF.

/s/ Kristopher Davis
Kristopher Davis

CERTIFICATE OF CONFERENCE

The undersigned certifies that on November 5, 2024, counsel for all parties met and conferred in accordance with L.R. CV-7(h). This motion is unopposed.

/s/ Kristopher Davis
Kristopher Davis